

**JUDGE KATHLEEN CARDONE**

**FILED**

**JUN 23 2021**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY hm  
DEPUTY CLERK**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**MIGUEL MARTINEZ,**

**Defendant.**

§ **CAUSE NO. EP-21-CR-**

§

§ **INDICTMENT**

§

§ **CT 1: 18 U.S.C. § 111(a)(1) & (b)-  
Assault of a Federal Officer**

§

§ **CT 2: 18 U.S.C. § 1361 – Damage to  
Government Property Under \$1,000**

**THE GRAND JURY CHARGES:**

**EP 21 CR1 063**

**COUNT ONE**

**(18 U.S.C. §§ 111(a)(1) & (b))**

**That on or about June 6, 2021, in the Western District of Texas, Defendant,**

**MIGUEL MARTINEZ,**

**knowingly and intentionally did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114, namely: J.E., a United States Border Patrol Agent, while he was engaged in and on account of his official duties, and where such act involved the use of a dangerous and deadly weapon, in violation of Title 18, United States Code, Section 111(a)(1) & (b).**

**COUNT TWO**

**(18 U.S.C. § 1361)**

**That on or about June 6, 2021, in the Western District of Texas, Defendant,**

**MIGUEL MARTINEZ,**

willfully and by means of throwing a screwdriver from a moving vehicle, did injure and commit a depredation against property of the United States and of any department and agency thereof, to wit: the United States Border Patrol, specifically the windshield of a United States Border Patrol vehicle, and the resulting damage was less than \$1,000, in violation of Title 18, United States Code, Section 1361.

A TRUE BILL  
**ORIGINAL SIGNATURE**  
**REDACTED PURSUANT TO**  
**E-GOVERNMENT ACT OF 2002**  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY:

  
\_\_\_\_\_  
Assistant U.S. Attorney